

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DAVID SAMBRANO, individually and on
behalf of all others similarly situated, *et al.*,

Plaintiffs,

v.

UNITED AIRLINES, INC.,

Defendant.

Civil Action No.: 4:21- 01074-P

PLAINTIFFS' MOTION TO EXTEND TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65(b)(2) and Local Civil Rule 7.1, Plaintiffs respectfully request that the Court extend the temporary restraining order entered on October 12, 2021 [ECF 66], as modified by the Order clarifying the temporary restraining order [ECF 72], enjoining Defendant United Airlines, Inc. ("United") from the conduct described therein. The temporary restraining order expires on October 26, 2021. The Court ordered mediation [ECF 81] is scheduled to occur on October 26, 2021.

Good cause exists because the temporary restraining order may expire before the Court can rule on whether a preliminary injunction is warranted, and before the parties are able to effectuate the terms of a settlement agreement, if any, that may be reached at mediation on October 26, 2021. An extension of the temporary restraining order is necessary to avoid risking irreparable injury and to maintain the status quo in this case pending resolution of Plaintiff's Motion for Preliminary Injunction [ECF 5], or the effectuation of a settlement agreement, if any agreement is reached.

October 21, 2021

Respectfully submitted,

/s/ John C. Sullivan

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*Counsel for Plaintiffs and the
Proposed Class*

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing motion has been served via the Court's electronic filing system upon all counsel of record.

/s/ Robert C. Wiegand

Robert C. Wiegand, Attorney for Plaintiffs

CERTIFICATE OF CONFERENCE

On October 21, 2021, I conferred with Donald Munro, attorney for Defendant, regarding the relief sought in the foregoing motion. Agreement could not be reached because Defendant is opposed to the relief sought. Accordingly, the foregoing is presented to the Court as opposed.

/s/ Robert C. Wiegand

Robert C. Wiegand, Attorney for Plaintiffs